

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JAROSLAW WASKOWSKI,

Plaintiff,

v

Macomb County Circuit Court
Case No. 10-106869-NI

U.S. District Court Case No. 11-cv-13036

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Defendant.

Lee Roy H. Temrowski, Jr. P-31967
Attorney for Plaintiff
45109 Van Dyke Ave.
Utica, MI 48317
(586) 254-5566

HEWSON & VAN HELLEMONT, P.C.
Mr. Michael J. Jolet
Attorney at Law
25900 Greenfield Road, Suite 326
Oak Park, MI 48237
(248) 968-5200

PLAINTIFF'S ITEMIZED DAMAGES

I. OUTSTANDING MEDICAL BILLS:

Oakland MRI.....	\$ 29,240.00
Dr. Stefan Glowacki.....	\$ 3,200.00
Euro Rehab.....	\$ 7,641.00
TOTAL.....	\$ 40,641.00

II. OUTSTANDING PRESCRIPTION EXPENSES

Prescription Expenses.....	\$ 108.00
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III. OUTSTANDING WAGE LOSS

Employed - Yes Express (Truck Driver)
Defendant paid wage loss 12/23/2009 through 03/07/2011
Defendant paid \$2,908.80 per month

Plaintiff is owed from 03/08/2011 through 11/26/2012
630 days x's \$96.96 per day
Total amount owed in wage loss.....**\$ 61,084.80**

IV. OUTSTANDING HOUSEHOLD HELP CLAIM

Service Providers:
Kamilla Waskowska
Margaret Jeziorowski

\$20.00 per day
7 days per week
\$140.00 per week

Defendant paid from 12/27/2009 through 11/20/2010

Plaintiff is owed from 11/21/2010 through 11/26/2012
Plaintiff is owed 695 days at \$20.00 per day.....**\$ 13,900.00**

Plaintiff is owed an additional **\$1,900.00** because (4 of the 7 checks were short):

* 04/18/2010 to 05/15/2010 - 28 days - Paid \$300.00 - 28 days x's \$20.00 = \$560.00
Minus \$300.00 pay = **\$ 260.00 owed**

* 05/16/2010 through 06/26/2010 - 42 days - Paid ZERO - 42 days x's \$20.00 = **\$840.00 owed**

* 08/22/2010 through 10/02/2010 - 42 days - Paid \$480.00 - 42 days x's \$20.00 = \$840.00
Minus \$480.00 paid = **\$360.00 owed**

* 10/03/2010 through 11/20/2010 - 49 days - Paid \$540.00 - 49 days x's \$20.00 - \$980.00
Minus \$540.00 paid = **\$440.00 owed**

\$13,900.00 owed + \$1,900.00 owed.....\$ 15,800.00

V. OUTSTANDING ATTENDANT CARE CLAIM

Service Providers:
Kamilla Waskowska
Margaret Jeziorowski

\$15.00 per hour
12 hours per day
\$180.00 per day
\$1,260.00 per week

Defendant paid from 12/27/09 to 11/20/2010
Plaintiff is owed from 11/21/10 to 11/26/2012
695 days @ \$180.00 per day.....\$125,100.00

Defendant paid \$13.00 per hour from 12/27/2009 through 11/20/2010
12/27/2009 through 11/20/2010 = 329 days
Defendant is short \$24.00 per day
329 days paid x's \$24.00 per day short.....\$ 7,896.00

Total Amount Claim for Attendant Care.....\$132,996.00

TOTAL DAMAGES CLAIMED BY PLAINTIFF

Medical Bills.....\$ 40,641.00
Prescriptions.....\$ 108.00
Wage Loss.....\$ 61,084.80
Household Help.....\$ 15,800.00
Attendant Care.....\$132,996.00
TOTAL AMOUNT CLAIMED.....\$ 250,629.80

Plaintiff is also claiming 12% Statutory Interest.....\$ 30,075.57

Plaintiff is also claiming costs and attorney fees (Amount Unknown)

Respectfully submitted,
/s/ Lee Roy H. Temrowski, Jr.

Dated: November 26, 2012

Lee Roy H. Temrowski, Jr.
Attorney for Plaintiff

Proof of Service

I served this document by e-filing it through Pacer to the U.S. District Federal Court and to the attorney of record in this case (shown on the caption) on November 26, 2012.

I declare that the statements above are true to the best of my knowledge, information and belief.

/s/ Sheri Pregano